



IN REPLY REFER TO:

United States Department of the Interior
BUREAU OF RECLAMATION

Ephrata Field Office
P.O. Box 815
Ephrata, Washington 98823



EPH-2212
WTR-7.00

MAR 14 2012

DEPARTMENT OF ECOLOGY

MAR 16 2012

WATER QUALITY PROGRAM

Ms. Laurie Morgan
Washington State Department of Ecology
Water Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Proposed Irrigation System Aquatic Weed Control National Pollutant Discharge Elimination System and State Waste Discharge General Permit, Columbia Basin Project, Washington

Dear Ms. Morgan:

We appreciate the opportunity to review and comment on the proposed Irrigation System Aquatic Weed Control National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit.

The Bureau of Reclamation, as the owner, and the Columbia Basin Irrigation Districts (Districts), as the operators, of a constructed water delivery system, are concerned with the outcome of this permit, due to the possible constraints which may be placed upon the operation and maintenance of our irrigation facilities. Reclamation supports any comments provided, or actions taken, by the Districts in order to maintain the operations of the facilities.

During discussions with the Districts, concerning the aquatic weed permit for irrigation and the changes being made to it; the items that raise the most concern are:

- The restriction being placed on the use of Acrolein. If the use of Endothall at the higher concentration cannot alleviate more of the aquatic growth in the irrigation facilities; Acrolein use in the irrigation infrastructure will still be needed to control the aquatic weed growth that often obstructs flows,
- Most of the Districts have voiced a concern regarding the length of time they are being given for reporting and submitting their discharge monitoring reports (DMR'S); they would prefer the language that gives them as much allowable time as possible for reporting because often times the laboratory analysis are not completed within the allotted reporting window,
- Finally, the monthly reporting of DMR's during the off season, can this be done once listing the months there will be no discharge, or does it need to be done separately month- by-month?

If you have questions or need additional information regarding these comments please contact Ms. Gina Hoff, Water Quality Specialist, at 509-754-0254 or through e-mail at ghoff@pn.usbr.gov.

Sincerely,



Stephanie Utter
Ephrata Field Office Manager

cc: Mr. Craig Simpson, Secretary-Manager
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